

October 10, 2008

Mr. Keith A. Orris
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**RE: RESPONSE TO YOUR RECENT LETTER
ASBESTOS MATERIALS AND IMPULSE NOISE LEVELS
RT PROJECT #71384-01**

Dear Mr. Orris:

To follow up our telephone conversation, I explained to you why the conclusion relating to the presence of friable asbestos materials does not appear to be correct.

Detailed information is as follows:

- Twelve samples is not adequate when characterizing a landfill/area of concern (AOC) of 90,000 cubic yards. Applicable Pennsylvania Department of Environmental Protection (PADEP) Guidance for basic sampling would indicate that there has to be eight to twelve samples per 3,000 cubic yards. Assuming eight samples per 3,000 cubic yards, there should have been at least 240 samples, before a conclusion could be reached as to whether or not there are friable asbestos materials in the landfill. Twelve samples is statistically inadequate, and we respectfully request the name and licensing of the professional on your team who reached the conclusion that twelve samples were adequate for the site characterization purposes.
- My conclusions relate to the sheet flooring products having a HYDROCORD backing. Your letter and the site characterization work simply did not address these materials. There is also no indication in any of the reports that those completing the investigation work at the landfill would have recognized this specific type of product line. Significant quantities of material rejected for quality assurance/quality control reasons and from "end of roll" and "trimming" waste generation are undoubtedly present at this site based on the historical research conducted and a public meeting confirmation that 8 to 10 trucks per day of flooring waste including sheet roll material were hauled to this landfill.
- My opinion regarding the practicality of the project planned to be implemented is that attempting to double-bag end of roll material and trimming material where the substrate has delaminated is difficult and time consuming, due to:
 - The bulkiness and dimensions of the material.
 - The fact that the substrate could fall apart in powdered form during attempts to bag, load, and place the material.



Mr. Keith A. Orris
Franklin & Marshall College
RT Project #71384-01
October 10, 2008
Page 2

Based on the above, the practicality of the project as proposed is unknown, until the extent and condition of HYDROCORD backed ACM products in the landfill is established.

- We understand from the PADEP that a new Soil Management Plan was to be prepared. This is important because to the degree that delaminated and powderized HYDROCORD backing is present, separation of soils and the waste mass will be that much more difficult and time consuming. Given the promises made to date, we trust that we will receive a copy of the updated plan when it becomes available. Please note carefully that all landfills of this age and vintage have some volume of friable asbestos materials, and much of tile and roll flooring product produced and disposed of at this facility can successfully be managed as indicated in your letter, except for those materials with the HYDROCORD backing. I would advise your project team to look into this issue further. Broad statements and conclusions based on twelve samples, given the size of the landfill, and the historic nature of materials placed in it, in my opinion, lack technical foundation. As offered twice, we will be glad to discuss the nature of HYDROCORD material further with your consultants.
- As promised to be provided to me at the April Public Meeting and reiterated in the August meeting notes on your webpage, measured impulse noise levels were promised. The noise report posted on the webpage, still does not have the promised impulse noise levels. As the data was stated to be available at our first meeting at your office in April, it is hard to understand why this information has not been provided. It is understood now that a berm with evergreen trees has been added to the plans as an extra measure for noise abatement. However, without the data on measured impulse noise levels, it cannot be determined to what degree the berm would be effective in reducing noise, and in particular, nighttime impulse noise from train car assembly, the stated purpose for the new yard area.

We asked a simple question at the meeting in your office, and will pose the same question again – *will a person in the nearby residential area, say, in a home on the cul-de-sac of Clayton Road sleeping at night with screened windows open, be able to hear impulse noise from train assembly rail yard operations – yes or no?*

As I stated to you on our recent telephone conversation, it is appreciated that our prior comments were taken seriously. However, it is my opinion that pushing forward with the project without fully addressing both of these issues – the presence of friable asbestos materials and impulse noise levels - is in all likelihood, a bad idea.

Mr. Keith A. Orris
Franklin & Marshall College
RT Project #71384-01
October 10, 2008
Page 3

We look forward to your response.

Very truly yours,

RT ENVIRONMENTAL SERVICES, INC.



Gary R. Brown, P.E.
President

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